

**ENRON**  
**Transwestern Pipeline Company**

P. O. Box 1188 Houston, Texas 77001 (713) 654-6161

90067773



July 27, 1987

NOTICES SECTION

JUL 28 1987

Mr. Darl Mount  
Pesticides & Toxic Substances Branch  
U.S. EPA Region VI  
1201 Elm Street  
Dallas, Texas 75270

NMD 094139599

Re: Transwestern Pipeline PCB Remediation

X-Ref SA Vol #1

Dear Mr. Mount:

Pursuant to our agreement for the 25 ppm cleanup level, Transwestern has been reviewing contractor bids and selecting remedial technologies to achieve this goal. Concurrently, we have conducted a PCB risk assessment as specified in the new EPA PCB cleanup policy (52 Fed. Reg. 10688 et seq.). We have analyzed the health risks of cleanup options. Based upon these assessment results, Transwestern is hereby requesting approval for a "clean and cover" variation to the 25 ppm remediation program. The health risk assessment demonstrates that the "clean and cover" option can be implemented in a more timely and cost effective manner with no increased health risks when compared to the traditional removal and onsite incineration program.

Enclosed is an advance copy of the health risk assessment study that Transwestern completed for the Corona, New Mexico Compressor Station, one of the sites in Region 6 where Transwestern will be conducting PCB remediation efforts. This study was prepared to determine the fate of, and potential health effects of, residual PCB contamination of less than 25 ppm that might be left in place after the site remediation program is finished. Concern about this issue arose at the same time that EPA promulgated its TSCA PCB spill cleanup policy on April 2, 1987 (52 Fed. Reg. 10688 et seq.).

In that policy, EPA established uniform national standards for cleaning up PCB spills. These standards are based on the concept that the risk to human health and the environment posed by residual contamination left after cleanup varies depending upon (1) the spill location; (2) the potential exposure to PCBs; (3) the concentration of the PCBs spilled; and (4) the nature and size of the population potentially at risk (p. 10689). While this policy is applicable to spills that occur after the

SUPERFUND FILE

MAR 24 1992

REORGANIZED

Mr. Darl Mount  
July 27, 1987  
Page 2

effective date of the rule (May 4, 1987), the rule also specifically addresses the issue of old spills and requires "site-by-site evaluation" of the risk exposure. In the policy, EPA states that:

(2) EPA recognizes that old spills which are discovered after the effective date of the policy will require site-by-site evaluation because of the likelihood that the site involves more pervasive PCB contamination than fresh spills (particularly on porous surfaces such as concrete). Therefore, spills which occurred before the effective date of this policy are to be decontaminated to requirements established at the discretion of EPA, usually through its regional offices. P. 10689.

To conform to this new national risk-based policy rule, Transwestern undertook a site-specific risk assessment study. The protocol for this risk assessment is the joint EPA-DHHS Toxicological Profiles Methodology for Superfund site contaminants published on April 17, 1987 (52 Fed. Reg. 12866 et seq.). A detailed risk assessment for each site in Region 6 will be presented at our meeting on July 30. An advance copy of the Corona site study is enclosed for your review. The toxicology, methodology, and assumptions used in this study are representative of the studies for the other sites. Throughout, the extremely conservative assumptions that Transwestern has used in this risk assessment are identified for the reader.

The results of these studies clearly demonstrate that there is no significant difference in health risks between the traditional removal to 25 ppm option and the "clean and cover" option.

Based on these results, Transwestern will request that EPA approve the clean and cover option. The April 2, 1987 TSCA spill policy clearly provides for allowing different cleanup approaches. In fact, the policy states that:

There may also be exceptional spill situations that require less stringent cleanup, or a different approach to cleanup, due to factors associated with the particular spill. These factors may mitigate expected exposures and risks or make cleanup to these requirements impracticable. (emphasis added) P. 10690.

Mr. Darl Mount  
July 27, 1987  
Page 3

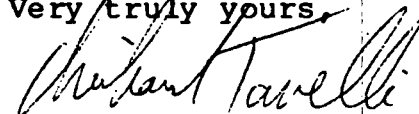
Transwestern's risk assessments demonstrate that the isolated locations, lack of population, concentrations of contaminants, and prevailing hydrogeological conditions at these four sites all mitigate and lessen the exposure and health risks sufficiently to warrant application of the clean and cover option.

The clean and cover option can be implemented immediately with existing technology and can be completed in less than one third the time required for the removal and on-site incineration option. The minimum time for completion of the incineration program is thirty (30) months due to the need for fabrication and permitting of complex, customized technology. The clean and cover option also could be implemented on a more cost effective basis; the incineration option would cost approximately 5 times as much as the clean and cover option.

At our meeting on July 30, Transwestern will submit work programs for these two options for the four stations in Region 6.

I look forward to our meeting this week, and I hope that these documents will be helpful to you in understanding our proposal under this evolving regulatory scheme. We appreciate your continued cooperation and look forward to an expeditious implementation of this remediation program.

Very truly yours,



Richard Tavelli

RCT:wpc  
Enclosures